

Clean Power Plan: Comments on 111d rulemaking

Recommendations Re: Waste-to-Energy November, 2014

Waste-to-Energy in VA: 5 facilities; combined generation of 212.5 MW, and 134,000 lbs/hr steam.

WTE - A Climate Mitigation Technology

Waste-to-Energy (WTE) has long been recognized internationally as a GHG mitigation technology by the Intergovernmental Panel on Climate Change (IPCC), the World Economic Forum and European Union and has been able to sell carbon offsets through the Clean Development Mechanism (CDM) of the Kyoto Protocol.

In the United States, the recent expansions of the Lee County and Hillsborough County waste-to-energy facilities in Florida are both generating carbon offset credits under the Voluntary Carbon Standard. In the European Union, by increasing the use of recycling, WTE and reducing waste sent to landfills, the waste sector has achieved the highest relative reductions of greenhouse gases of any sector in the economy at 34%.

Compliance Measurement

The proposed rule defers to the states what qualifies as renewable energy. Currently, the Federal government, 31 states (including Virginia), the District of Columbia, and two territories define all of WTE's energy as renewable.

The EPA should clarify in its guidance that each megawatt hour from WTE facilities can count as a full megawatt hour toward reducing emissions from affected electric generating units in a state's plan. This clarification will ensure the final rule is aligned and consistent with existing Virginia programs and Federal statute and policy. Power from WTE facilities is well recognized internationally and domestically, including by the EPA, as an effective GHG mitigation tool.

Full carbon/GHG compliance credit for WTE is consistent with existing state and federal precedent, provides Virginia with greater compliance flexibility, and ensures a robust mix of renewable energy technologies. Furthermore, because WTE prevents the generation of methane from waste otherwise destined for landfills, there is a significant co-benefit of reducing methane emissions. In fact, the U.S. EPA has determined that every ton of waste managed at a WTE facility actually reduces overall GHG emissions by a ton of carbon dioxide equivalent, largely as methane.

Clarifying Virginia's ability to include WTE's full compliance value will result in the appropriate accounting for the energy generated, and create the important co-benefit of significant methane emission reduction associated with a more robust landfill diversion program.